

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

MOHSEN MAHDAWI,

Petitioner,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; PATRICIA HYDE, in her official capacity as Acting Boston Field Office Director; Vermont Sub-Office Director of Immigration and Customs Enforcement; TODD M. LYONS, in his official capacity as Acting Director for U.S. Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; MARCO RUBIO, in his official capacity as Secretary of State; and PAMELA BONDI, in her official capacity as Attorney General of the United States,

Respondents.

Case No. 2:25-cv-00389

NOTICE OF DEPOSITION OF SECRETARY OF STATE MARCO RUBIO

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Petitioner Mohsen Mahdawi, by and through counsel, will take the deposition of Secretary of State Marco Rubio, on _____, 2025, beginning at 9:00 a.m. at Beldock, Levine & Hoffman LLP, 99 Park Avenue, New York, NY 10016 or at such other date, time, and/or location as the parties may agree to. The deposition is to be conducted and recorded by stenographic means before a person duly authorized to administer oaths and also by videotape or other audiovisual means.

Dated: June 11, 2025
Burlington, Vermont

Respectfully submitted,

/s/ Lia Ernst
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Hillary A. Rich
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*Pro Hac Vice

***Pro Hac Vice application forthcoming

CERTIFICATE OF SERVICE

I, _____, hereby certify that I caused a true and correct copy of the foregoing
Notice of Deposition to be served on _____ 2025, by electronic mail on the following:

Michael Drescher
Assistant United States Attorney
District of Vermont
michael.drescher@usdoj.gov

Dated: _____, 2025

/s/ _____